

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re:	)		
	)	Case No. 22-11068 (KBO)	CLERK
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	)		US BANKRUPTCY COURT
	)	(Jointly Administered)	DISTRICT OF DELAWARE
	)		
Debtors.	)		
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**MOTION TO SHORTEN NOTICE WITH RESPECT TO MOTION FOR (I) STATUS  
CONFERENCE AND LIMITED ADMINISTRATIVE RELIEF REGARDING  
DISPOSITION OF FTT; AND (II) IN THE ALTERNATIVE, ORDER UNDER 11  
U.S.C. § 554(b)**

Movant Kihyuk Nam, respectfully moves, pursuant to Del. Bankr. L.R. 9006-1(c) and Fed. R. Bankr. P. 9006, for entry of an order shortening notice so that his Motion for (I) Status Conference and Limited Administrative Relief Regarding Disposition of FTT; and (II) in the Alternative, Order under 11 U.S.C. § 554(b) (the “Underlying Motion”) may be heard at the omnibus hearing on September 11, 2025 at 1:00 p.m. (Eastern Time), with objections due by September 9, 2025 at 4:00 p.m. (Eastern Time). In support:

1. Cause. Good cause exists to shorten notice under Del. Bankr. L.R. 9006-1(c). The Underlying Motion seeks only narrow, non-disruptive administrative relief within the Court’s retained jurisdiction (a status conference, a meet-and-confer/report, and an interim preservation step), does not modify Plan economics, distributions, reserves, class treatment, or timing, and will conserve resources by allowing the Court to consider scheduling and administration at the already-set omnibus hearing. Given the compressed timeframe before the

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<sup>1</sup> Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

September 11, 2025 omnibus hearing, Movant was unable to obtain the Trust's position on this scheduling request before filing; Movant will promptly confer with counsel for the FTX Recovery Trust and advise the Court if any party intends to oppose the shortened schedule.

2. Efficiency and lack of prejudice. Hearing the Underlying Motion on September 11, 2025 at 1:00 p.m. (Eastern) will conserve judicial and party resources. The proposed objection deadline of September 9, 2025 at 4:00 p.m. (Eastern) affords a fair opportunity to respond. Contemporaneously with filing, Movant has served the Underlying Motion and this Motion to Shorten by electronic mail on counsel to the FTX Recovery Trust and the Office of the United States Trustee, and will effect any additional service the Court may direct. Movant will promptly confer with those parties regarding scheduling and will advise the Court if any party intends to oppose the shortened schedule.

3. No previous request. No previous request for this relief has been made.

4. Certification under L.R. 9006-1(e). Movant certifies that the relief requested herein is necessary to avoid prejudice to a prompt administrative scheduling decision and that the requested notice is reasonable under the circumstances. Movant attempted on September 1, 2025 to obtain the positions of the Office of the United States Trustee and counsel for the FTX Recovery Trust regarding the shortened schedule but, due to the compressed timing, was unable to receive a response prior to filing. Movant will promptly confer with those parties and will promptly notify the Court if any party intends to object.

**WHEREFORE**, Movant requests entry of the proposed order, contemporaneously herewith (i) scheduling the Underlying Motion for hearing on September 11, 2025 at 1:00 p.m. (Eastern Time), (ii) setting the objection deadline at September 9, 2025 at 4:00 p.m. (Eastern Time), and (iii) granting such other and further relief as is just and proper.

Dated: September 1, 2025  
Incheon, South Korea

Respectfully submitted,

**KIHYUK NAM**

/s/ Kihyuk Nam

Kihyuk Nam  
107 Haedoji-ro, Building 2, 2404  
Yeonsu-gu, Incheon 21997  
South Korea  
Telephone: (+82) 10-2914-4866  
Facsimile: (+82) 508-911-8431  
E-mail: kihyuknam@hanyang.ac.kr

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-11068 (KBO)
Debtors.	)	(Jointly Administered)
	)	
	)	
	)	
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**ORDER SHORTENING NOTICE WITH RESPECT TO MOTION FOR (I) STATUS  
CONFERENCE AND LIMITED ADMINISTRATIVE RELIEF REGARDING  
DISPOSITION OF FTT; AND (II) IN THE ALTERNATIVE, ORDER UNDER 11  
U.S.C. § 554(b)**

Upon the Motion to Shorten Notice (the “Motion to Shorten”) filed by Kihyuk Nam;  
and after due consideration and finding good and sufficient cause therefor, IT IS HEREBY  
ORDERED:

1. The Motion to Shorten is GRANTED.
2. The Motion for (I) Status Conference and Limited Administrative Relief Regarding Disposition of FTT; and (II) in the Alternative, Order under 11 U.S.C. § 554(b) (the “Underlying Motion”) shall be heard on September 11, 2025 at 1:00 p.m. (Eastern Time) before the Honorable Karen B. Owens, Chief United States Bankruptcy Judge, at 824 North Market Street, Wilmington, Delaware 19801.

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<sup>1</sup> Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. Objections or responses to the Underlying Motion shall be filed and served so as to be actually received no later than September 9, 2025 at 4:00 p.m. (Eastern Time).

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**Dated: September \_\_\_\_, 2025**  
**Wilmington, Delaware**

**THE HONORABLE**  
**KAREN B. OWENS**  
**CHIEF JUDGE**